

**TECHNICAL REVIEW DOCUMENT**  
**For**  
**MODIFICATION TO OPERATING PERMIT 95OPAR118**

Buckley Air Force Base  
Arapahoe County  
Source ID 0050018

Prepared by Matthew S. Burgett  
August 30, 2005

**I. Purpose:**

This document establishes the decisions made regarding the requested modifications to the Operating Permit for the Buckley Air Force Base. This document provides information describing the type of modification and the changes made to the permit as requested by the source and the changes made due to the Division's analysis. This document is designed for reference during review of the proposed permit by EPA and for future reference by the Division to aid in any additional permit modifications at this facility. The conclusions made in this report are based on the information provided in the original request for modification submitted to the Division on June 15, 2005, various e-mail correspondence and telephone conversations with the source. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

**II. Description of Permit Modification Request/Modification Type**

The renewal operating permit for the Buckley Air Force Base was issued on July 1, 2002. Buckley submitted a request on June 15, 2005 to modify the operating permit to increase the gasoline throughput at the service station located there, and make a few other minor changes to the permit. In their request the source indicated that the modification met the requirements for a minor permit modification and requested that the modification be processed under the minor modification procedures in Colorado Regulation No. 3, Part C, Section X. The requested VOC emissions increase associated with this gasoline throughput increase is below the PSD significance level.

Colorado Regulation No. 3, Part C, Section X.A identifies those modifications that can be processed under the minor permit modification procedures. Specifically, minor permit modifications “are not otherwise required by the Division to be processed as a significant modification” (Colorado Regulation No. 3, Part C, Section X.A.6). The Division requires that “any change that causes a significant increase in emissions” be processed as a significant modification (Colorado Regulation No. 3, Part C, Section I.B.36.h.(i)). Since requested emissions are below PSD significance levels, the Division agrees that this modification qualifies as a minor modification.

### **III. Discussion of Modifications Made**

#### **Source Requested Modifications**

The Division addressed the source's requested modifications as follows:

##### Responsible Official & Facility Contact

The Division revised the information for the responsible official and facility contact person as requested. The responsible official has been changed to the generic “Installation Commander”. The specific Installation Commander changes every 2-3 years, so listing the Installation Commander as the responsible official should prevent frequent revisions to the permit.

##### Semi-Annual Monitoring Reports and Annual Compliance Reports

Buckley requested that the time frame to submit the reports be extended from one month to two months. The Division will not allow this request since we require timely information in order to determine compliance.

##### Attainment Status

The Division has updated the language in Section I, Condition 4 to reflect the current attainment status of Arapahoe County as requested.

##### Standby Generators

Buckley requested that the Division refer to the generators in Section II, 4, as standby generators instead of emergency generators. The Division has made this change and agrees that these are not really emergency generators. This change will not have any affect on the current permit limits or PTE, since the Buckley Title V permit has facility wide emission limits.

##### Natural Gas

The Division has removed the reference to natural gas in Section II, Condition 2.1. These engines can not operate on natural gas and this language was obviously included in error.

### Engine Removal

The Division has removed the Cat D399 (s/n: 35B4629) engine from the equipment list in Section I, Condition 6.1 as requested. Buckley has informed the Division that this engine is not operational and will not be operational.

### Portable Hydrocarbon Reference Material

Buckley has requested that the Division allow for the use of a hydrocarbon analyzer, which uses isobutylene as a reference material. Section II, Condition 4.1.2 previously required monitoring as required in Regulation No. 7, Section VIII.C.3. This section requires the use of methane or hexane as a reference material. However, the fuel storage tanks are not really subject to this section of Reg. 7, but the previous permit engineer wanted them to use similar leak detection procedures. This request was discussed with the field enforcement staff at APCD. They agreed that the use of isobutylene is common, appropriate, and should be allowed. Thus, the language in the permit has been modified to allow the use of alternative reference material in the portable hydrocarbon analyzer.

### NSPS Kb

NSPS Kb was revised by the EPA in 2003 to remove the recordkeeping requirement that these tanks were subject to. The Division has removed Section II, Condition 4.4 since the referenced requirement no longer exists. The tanks at Buckley are all exempt from the requirements of NSPS Kb due to tank size and vapor pressure. Appendix G is now blank since none of the tanks are subject to subpart Kb.

### Degreasers

Buckley only operates solvent cold-cleaners, so the title of Section II, 5 has been revised from "degreasers" to "cold cleaners" as requested.

### VOC Emissions

The title of Section II, 6 has been changed from "Fugitive VOC Emission Control" to "Fugitive VOC Emissions" as requested.

### Facility Emissions

Buckley has a facility wide emissions limit in the permit. They are required to conduct a rolling 12-month total for the permitted units, and an annual emission calculation for all emission units (including insignificant units). Section II, 8 was confusing because it was titled "All Sources" and then explained about the rolling 12-month calculation. The Division will revise the title to "Permitted (significant) Sources" to make it clear that only the permitted units need to be included in the rolling 12-month calculation.

### Insignificant Activities

The list was revised to remove the rock crusher as requested.

### Appendix C

A typo in the header of Appendix C was corrected.

### Service Station

Buckley requested that the gasoline throughput at the Base Exchange Service Station be increased from 3.1 million to 6.0 million gallons per year. This resulted in a VOC emission increase from 5.1 to 9.3 tons per year. This is not considered a significant emission increase for PSD and the Division can process this as a minor modification to the Title V permit.

**Emission Factors** – Emissions of VOC are calculated based on an emission factor of 3.1 pounds VOC per thousand gallons of gasoline throughput. This emission factor takes into consideration the Stage I and Stage II vapor controls used at Buckley.

**Monitoring Plan** – As in the previous version of the permit, Buckley will be required to determine gasoline throughput and VOC emissions on a rolling 12-month basis. Conditions 7.1 – 7.3 have been revised to reflect current language.

### Other Modifications

In addition to the requested modifications made by the source, the Division used this opportunity to include changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this modification.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments on other permits, to the Buckley AFB Operating Permit with the source's requested modifications.

### Page Following Cover Page

Added language specifying that the semi-annual reports and compliance certifications are due in the Division's office and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

### Section I – General Activities and Summary

Conditions 13 and 17 in Condition 1.4 were renumbered to 14 and 18 and Condition 21 in Condition 1.5 was renumbered to 22. The renumbering changes were necessary due to the addition of the Common Provisions requirements in the General Conditions of the permit.

### Section III – Permit Shield

The citation in the permit shield was corrected. The reference to Part A, Section I.B.43 was changed to Part A, Section I.B.44 and the reference to Part C, Section XIII was changed to Part C, Section XIII.B.

#### Section IV – General Conditions

Added language from the Common Provisions (new condition 3). With this change the reference to “21.d” in Condition 20 (prompt deviation reporting) will be changed to “22.d”, since the general conditions are renumbered with the addition of the Common Provisions.

Removed the upset and breakdown provisions from Condition 4 (emergency provisions) since they are included in the Common Provisions.

The citation in General Condition 17 (open burning) was revised. The open burning requirements are no longer in Reg 1 but are in new Reg 9. In addition, changed the reference in the text from “Reg 1” to “Reg 9”.